



**HELEN F. DALTON & ASSOCIATES, P.C.**  
ATTORNEYS AT LAW

---

80-02 Kew Gardens Road, Suite 601, Kew Gardens, NY 11415  
Tel. (718) 263-9591 Fax. (718) 263-9598

April 11, 2025

**Via ECF:**

The Honorable Robert M. Levy, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East Brooklyn,  
New York 11201

Re: ***Lliguicota v. Haian Honest Renovation Inc. et al.***  
***Civil Docket No.: 1:24-cv-08531-LDH-RML***

Dear Judge Levy:

We represent the Plaintiff in the above-referenced matter, and we submit this motion to respectfully request leave of fourteen (14) days to file Motion for Default Judgment against all Defendants.

On April 1, 2025, our office filed a request for certificate of default against all Defendants and such default was duly noted by the Clerk of Court on April 3, 2025. *See* Dkt. Nos. 13 & 15. True and correct copies of our request and the Certificate of Default were served to all Defendants via United States First-Class Mailing, at the Defendants' usual place of abode and last known residence on April 2, 2025 and April 3, 2025, respectively. *See* Dkt. Nos. 14 & 16.

Over the past week, our office has been consistent in reaching out to all defendants in order to permit them every opportunity to appear and defend in this action so that this action may be adjudicated on the merits, or for the parties to settle this matter on their own accord. However, to date, Defendants have not formally appeared in this action nor has anyone contacted us regarding this Action. Defendants have been properly served and are aware of the complaint filed against them and their time to respond to the Complaint has since passed.

Further, our office is still in the process of having the Plaintiff review and sign his respective Affidavit in support of his claims which we were unable to complete due to scheduling conflicts. We are also still in the process of obtaining the "non-military affidavits" for the three individual defendants pursuant to the Servicemembers Civil Relief Act, 50a U.S.C. § 521.

In view of the foregoing, Plaintiff respectfully requests leave of fourteen (14) days from the date of this motion or Your Honor's endorsement thereof, to move for default judgment against all Defendants.

In the event that the Defendants contact our office or retain counsel on this matter, we will promptly notify The Court of same.

We thank the Court for its consideration on this matter and we remain available to provide any additional information.

Respectfully submitted,

Roman Avshalunmov  
Roman Avshalunmov, Esq.

CC (via U.S. First Class Mail):

**HAIAN HONEST RENOVATION INC.**  
14110 25<sup>th</sup> Rd, Apt. 3C, Flushing, NY 11354

5615 231<sup>st</sup> Street, Oakland Gardens, NY 11364

**HAI WANG**  
14110 25<sup>th</sup> Rd, Apt. 3C, Flushing, NY 11354

**ZEMEI WANG**  
5615 231<sup>st</sup> Street, Oakland Gardens, NY 11364

**JILIN ZHONG**  
5615 231<sup>st</sup> Street, Oakland Gardens, NY 11364